

MBNA America Bank, N.A. 1100 North King Street Wilmington, Delaware 19884-0127

July 22, 2004

Jennifer J. Johnson
Secretary
Board of Governors of the Federal
Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

Re: FACT Act Section 213(e) Study - Docket No. OP-1195

Dear Ms. Johnson:

This letter is submitted on behalf of MBNA America Bank, N.A. ("MBNA") in response to the Board's notice and request for public comment on its study concerning prescreened solicitations.

MBNA is a member of the Coalition to Implement the FACT Act (the "Coalition"), which is submitting comments to the Board on this matter. MBNA participated in the preparation of, and fully endorses, the Coalition's comments.

If you have any questions concerning these comments, or if we may otherwise be of assistance in connection with this matter, please do not hesitate to contact the undersigned.

Sincerely,

MBNA America Bank, N.A.

By /s/ Joseph R. Crouse Joseph R. Crouse Legislative Counsel (302) 432-0716